

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ZUJEILY ADORNO MERCADO

DEBTOR(S)

CASE NO. 19-06479 BKT

CHAPTER 13

**TRUSTEE'S OBJECTION TO CLAIM NUMBER 15
FILED BY ASOCIACION PROPIETARIOS PRADERAS DE NAVARRO
NOTICE AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COMES NOW, Alejandro Oliveras Rivera, Chapter 13 Trustee, who most respectfully, STATES and PRAYS as follows:

1. On January 14, 2020, claim number 15 was filed by ASOCIACION PROPIETARIOS PRADERAS DE NAVARRO in the amount of \$1,019.80. The Trustee objects to this claim under the following grounds:
 - FBRP 3001(d) requires that the proof of claim filed as secured shall be accompanied by evidence of the security interest.
 - Finally, in the eventuality that the aforementioned claim is to be deemed allowed as unsecured, we hereby object to the allowance since the same was filed after the bar date for unsecured creditors elapsed, thus, pursuant to FBRP 3002(c), the time for filing a proof of claim has transpired.
2. The "Servicemembers Civil Relief Act" affidavit is not necessary since claimant is not an individual. LBR 3007-1 and 9013-1(c)(4).

WHEREFORE, for the reasons stated above, it is respectfully requested from this Honorable Court to **disallow** the aforementioned claim.

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice

requires otherwise. If you file a timely response, the court may schedule a hearing.

CERTIFICATE OF SERVICE: I hereby certify that on this date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who in this case have registered for receipt of notice by electronic mail. I further certify that the foregoing has been served to U.S. Trustee at ustpreion21.hr.ecf@usdoj.gov and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants: debtor(s), debtor's attorney, creditor, **ASOCIACION PROPIETARIOS PRADERAS DE NAVARRO, PO BOX 361541, SAN JUAN, PR 00936-1541** and creditor's attorney, **CARLOS A PLOVANETTI DOHNERT, ESQ. BANCO COOPERATIVO 804 B, 623 PONCE DE LEON, SAN JUAN, PR 00917** and parties in interest that have filed notices of appearance, included in the service list attached to the original hereof.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 6th day of May, 2020.

/s/ALEJANDRO OLIVERAS RIVERA

ALEJANDRO OLIVERAS RIVERA

CHAPTER 13 TRUSTEE

PO BOX 9024062

SAN JUAN PR, 00902-4062

PHONE: 787-977-3500

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CCC-SRB

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CERTIFICATE OF MAILING

The undersigned hereby certifies that a true copy of the foregoing document was mailed by first class mail or electronically sent to the parties listed below:

ASOCIACION DE PROPIETARIOS PRADERAS DE NAVARR
PO BOX 361541
SAN JUAN, PR 00936 -1541

ASOCIACION PROPIETARIOS PRADERAS DE NAVARRC
CARLOS A PIOVANETTI DOHNERT ESQ
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ZUJEILY ADORNO MERCADO
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PO BOX 186
CAGUAS, PR 00726-0186

DATED: May 06, 2020

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/s/GISELA BERRIOS

OFFICE OF THE CHAPTER 13 TRUSTEE